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July 22, 2025

VIA ECF

Judge Eric R. Komitee
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Withdrawal Without Prejudice of Motion to Enforce Settlement on Record

Onfroy v. The Law Office of Geoffrey T. Mott, P.C., et al., No. 1:22-cv-02314-EK-LB

Dear Judge Komitee:

This firm, along with Nassau Suffolk Law Services Committee, Inc., represents Plaintiff Lovern Onfroy in the above-entitled action against Defendants The Law Offices of Geoffrey T. Mott, P.C., Geoffrey T. Mott, and Samuel Miller (“Defendants”) for their violations of the Fair Debt Collection Practices Act.

Plaintiff filed a Motion to Enforce Settlement on Record on July 1, 2025 [DE 84] regarding the settlement read into the record on May 30, 2025. Defendants filed an opposition on July 21, 2025. Defendants had emailed an executed Confession of Judgment on July 6. On July 13 Defendants delivered original of an executed Confession of Judgment – but a different one than was previously emailed – and did not note the revisions between the two executed documents.

Counsel for the Parties conferred extensively via Zoom today regarding the issues raised in the application and the opposition. Counsel for the Parties went line by line over a revised Confession of Judgment that would track the May 30 settlement on the record, and counsel for the Parties agreed on the language. Counsel for Defendants forwarded the revised language to their clients to insert additional information, to execute, and to return an executed copy.

Consequently, Plaintiff requests the withdrawal without prejudice of her Motion to Enforce Settlement on Record. If the Parties are unable to resolve this issue, the Plaintiff intends to re-file a Motion to Enforce by August 8.

Sincerely,

/s/

Ahmad Keshavarz